



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 24 2011

Ed Bakowski
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

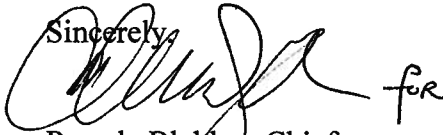
Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has the following comments on the Illinois Environmental Protection Agency's (IEPA) draft renewal of the Clean Air Act Permit for XPAC (application number 95120076).

1. Draft permit condition 7.1.3.c. refers to painting booths, which Subsection a defines the paint booths as 'coating operations'. Please correct this to avoid any confusion. This section also incorrectly cites to Attachment 1 for allowable emission rates of particulates. Attachment 2 actually contains the allowable emission rates for particulates. Attachment 1 is an example of a compliance certification form. Please correct this mistake.
2. The following permit terms do not cite an origin and authority:
 - a) 5.6.1
 - b) 5.6.3
 - c) 5.7.2
 - d) 7.1.5
 - e) 7.1.7.a.
 - f) 7.1.9
 - g) 7.1.10
 - h) 7.1.12Please provide an origin and authority for each above-mentioned permit condition.
3. Condition 5.8 does not contain any source-wide monitoring of the annual limits. Please add monitoring and recordkeeping of this source-wide annual limit.
4. Condition 7.1.7.b. incorrectly cites to 40 CFR 39.40. Presumably this refers to 40 CFR 63.3940. Please correct this with appropriate citation.
5. Condition 7.1.9.b. references 5.5.1 which does not exist. Presumably this refers to condition 5.6.1. Please correct this with appropriate citation.
6. Condition 7.2.3 requires the Permittee to discharge no more than 8 lbs/hour of organic material from the cold cleaning operations. The draft permit does not contain

any associated monitoring or recordkeeping for this limit. Later in the section, records are required to be kept on a pound per month and ton per year basis. However, there does not appear to be any compliance procedure for this permit condition. Please clarify or insert appropriate monitoring and recordkeeping.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Jennifer Darrow, of my staff, at (312) 886-6315.

Sincerely,

Pamela Blakley, Chief
Air Permits Section